

Unlocking Europe's Prosperity: Building the Next Generation of European Standards

Modernising the European Standardization System (ESS) to remove standardization from the "Terrible 10" and reinforce the Single Market

A strong Single Market is essential to Europe's prosperity, competitiveness, and its technological and global leadership. As work progress on the **European Product Act (EPA)**, including the revision of **Regulation 1025/2012**, standardization has gained renewed political attention, especially since it was identified in 2024 as one of the "Terrible 10" barriers to the Single Market.

CEN and CENELEC fully recognise the importance of improving efficiency. We are strongly committed to modernising our processes, strengthening transparency, and delivering faster results.

At the same time, it is essential to provide a **fact-based understanding of where time is spent** in the development of European Standards in support EU to legislation, and where improvements depend on joint efforts with the European Commission and other actors.

Is developing a Standard at European level really an eight-year process?

During the structured dialogue between the European Parliament IMCO committee and Commission EVP Séjourné on 24 March 2026, references were made to standardization processes taking as long as eight years in average. While such figures speak to the complexity of the system, they do not represent the reality of most development cycles today, nor do they reflect the substantial improvements already implemented. Building on this progress, there is an opportunity for all partners – CEN, CENELEC, the European Commission and stakeholders – to further streamline their respective contributions and continue reducing overall timelines, whilst uploading the quality and broad stakeholder engagement expected with a European Standard.

Standardization is a shared process in which timelines depend on many interlinked steps, including the availability of harmonized mandate requests, timely Commission input, and engagement by all stakeholders. A factual and up-to-date view of these timelines is therefore essential to guide an effective reform of the European Standardization System.

1. Understanding the development timeframe: A shared responsibility

The duration of Harmonized Standards (hENs) development is often presented as a single figure, yet it reflects **three distinct phases**, with **shared responsibilities**.

Phase A – Adoption of standardisation request – 1.7 years on average (2024)¹

Responsibility: European Commission

This phase covers the preparation, adoption, and notification of the standardization request by the European Commission. Right now, CEN and CENELEC cannot begin drafting until this is completed.

Phase B – Drafting of the Standard – 3,1 to 4,4 years on average (2024)²

Responsibility: CEN and CENELEC (+ Commission HAS consultant interaction)

- **3.1 years** for homegrown hENs
- **4.4 years** for hENs based on ISO/IEC work

This phase includes the **HAS consultant reviews**, which add necessary checks but also create additional iterations.

In the absence of HAS intervention (i.e., for non-harmonized ENs), drafting takes only 2.6 years (homegrown) to 2.7 years (ISO/IEC-based).

Phase C – Submission and publication – 1,2 years on average (2024)¹

Responsibility: European Commission and CEN and CENELEC

1.2 years total, including **0.3 years** for CEN and CENELEC to offer the published standards for citation and **0.9 years** for the Commission OJEU citation process.

CEN and CENELEC as well as the Commission is actively working on improving these timelines, as evidence by the Commission citation time decreasing to 0.7 years in 2026 and CEN and CENELEC updating our processes in 2025 to offer standards for citation as soon as published instead in batches every quarter (0.3 years).

→ **Average development time of Harmonized Standards** from standardisation request to citation in 2024 according to the Commission evaluation report¹ is **6.1 years**.

This is significantly shorter than pre-Regulation 1025/2012, but still too long for the needs of Europe's fast-moving economy.

¹ This figure is from the European Commission's [evaluation of Regulation 1025](#) assessing 2024 data, see Annex I

² This figure is CEN and CENELEC data on standards development time from 2024, see Annex II

Crucially:

- CEN and CENELEC account for around half of the total time.
- The remaining time corresponds to Commission procedures over which we have no control.

This distinction is essential for designing effective reforms under the EPA.

A revealing comparison: non-harmonized ENs (see Annex II)

- Non-harmonized homegrown ENs take **2.6 years to draft**.
- Non-harmonized ENs based on ISO/IEC take **2.7 years to draft**.

This demonstrates that **the additional procedures linked to harmonization (HAS checks, Commission quality reviews, and OJEU citation) are the main drivers of longer timelines.**

2. What CEN and CENELEC are already implementing: modernization, improvement, efficiency

CEN and CENELEC have launched a system-wide modernization programme to ensure the ESS remains fit for purpose in a fast-changing technological and geopolitical context. Key initiatives include:

- **The CEN and CENELEC Standardization Hub:** A forward-looking approach making CEN and CENELEC a central integrator of high-quality deliverables from outside the ESS that would consolidate expertise, increase coherence and interoperability across sectors, and strengthen agility while preserving the core principles of the ESS.
- **Modernisation of tools and workflows:** Upgraded digital platforms for drafting, voting, commenting, and information management to accelerate and simplify technical work.
- **Streamlined internal processes:** Revised procedural guidance, improved time-management structures, and enhanced early coordination to reduce drafting bottlenecks.
- **New standardisation deliverables:** Providing agile, consensus-based technical references within the formal ESO framework, particularly valuable in emerging areas where full European Standards (ENs) may take longer to develop.
- **Better integration with HAS processes:** Based on the ESO-EC Taskforce CEN and CENELEC have implemented clearer templates, stronger pre-submission checks, and more systematic legal-technical support to minimize unnecessary HAS iterations.

3. A coherent, future-proof ESS requires shared responsibility

To meet Europe's ambitions, improvements must take place across the full standardization chain:

- Faster adoption of standardization requests and early dialogue with the ESOs
- Greater efficiency in HAS and citation processes
- Balanced and realistic policy mandates
- Continued modernization within CEN and CENELEC

Strong commitment to European values and global leadership remains essential. A modern ESS must support Europe's strategic autonomy, reinforce democratic legitimacy, and maintain Europe's influence in international standardization – key to long-term prosperity.

CEN and CENELEC are committed partners in strengthening the Single Market. We stand ready to work with the European Parliament, the Council, and the Commission to ensure a coherent, efficient, and future-proof European Standardization System – one capable of delivering for Europe's economy, values, and long-term prosperity.

Join the Conversation on Europe's Standardization Future!

CEN and CENELEC warmly invite Members of the European Parliament, Council representatives, and Commission officials to engage with us and learn more about the tools and processes that drive European standardization.

Whether you are familiar with the ESS or encountering it for the first time in the context of the upcoming European Product Act and the discussions around the "Terrible 10", we stand ready to explain how standards are developed, where timelines originate, and how we are collectively addressing the challenges identified at EU level. A clearer understanding of the system is essential to ensuring that the reforms under consideration are targeted, effective and maintain Europe's values and global influence.

Annex I: Commission data on standard development timeframes

In the Commission Staff Working Document on the Evaluation of Regulation (EU) No 1025/2012 on European standardization from 2025, the following table is presented concerning the time for the citation of a harmonized standard, from Standardization Request until final citation in the OJEU.

Table 4: Pre/post Regulation 1025/2012 comparison of average duration of standard development at the request of the Commission. Source: Evaluation study, Section 4.1.1.1

Phase	Subphase	Baseline (before the Regulation) determined in the evaluation study		After the Regulation (assessed in 2024)
		Low estimate	High estimate	
Phase A: adoption & notification of standardisation request	Standardisation requests adopted by the European Commission	0.8 year (9 months)	0.8 year (9 months)	1.7 years
	Phase B: Delivery of the standard	Acceptance of standard request by the ESOs	0.7 years (5 months)	
	Drafting stage	2.7 years	5 years	3.1 years
Phase C: Submission and publication	ESO submission to the European Commission	5.4 years	5.4 years	0.3 years (3 months)
	Citation time in the OJEU	Not available	Not available	0.9 years (11 months)
Total		9.6 years	11.9 years	6.1 years

Annex II: CEN and CENELEC data on standard development timeframes

CEN and CENELEC data on the development time of standards (ENs) and harmonized standards (hENs) from 2024 is presented below, the data is presented in years. This standard development time refers only to the drafting time, corresponding with the 'drafting stage' phase B in the Commission data presented above.

